

7 May 2012

To: The Federal Communication Commission  
Re: Comments - Proceeding 99-25

I wholly support the expansion of the LPFM service.

***Concerning "Classes of service" - "Eligibility and Ownership" - "Translators for LPFM's"***

I believe the technical rules for an LPTV service should be the same the current FM translator service. 1 watt to 250 watts should be available on a "what ever fits basis" and no 30 meter limit for Height Above Average Terrain. After initial applications are filed, directional antennas should be allowed to be used to eliminate MX'd situations and/or to increase power. In MX'd situations applicants should be allowed to amend their application to another channel that technically fits for use in the LPFM service as long as it has some overlap (maybe at least 10%) with the original application. "Filing Windows" should happen monthly, perhaps the first five business days of each month.

LPFM's should be able to apply for translator or booster stations on a vary limited basis. It should be a special class of translator service that can not be sold off for other uses, such as full power Commercial or Educational stations. Translator stations for use with LPFM's should not be allowed to extend the coverage of the main station beyond 10 miles of the either the LPFM's transmitter site or the master coordinates of the community of license, except to serve areas with no other local service. LPFM translators should be secondary to new LPFM main stations.

Qualified organization should be able to purchase or lease an existing FM translator station for conversion to use in the LPFM service (it still must be the organizations only LPFM station). Stations acquired this way may be returned to it's original use.

Directors / Board members should not be disqualified for having other broadcast interests (Commercial or Educational) . The only limitation should be that no person should have any degree of control over more than one LPFM or has in any part control of an FM channel that is educationally reserved that serves that same community or has signal overlap. LPFM in part was originally intended as a "gate way" to electronic media. Experienced broadcasters can be an aid in making these community voices work.

***Concerning the "Eligibiliy of Native Nations"***

I am concerned that the Commission or it's staff would think it's appropriate to give preferential or prejudicial treatment to anyone based on the color of their skin, or the political (tribal) structure a person may in part live under. I think the Commission's proposal is demeaning to Native Americans.

Native Americans are no less capable than anyone else when it would come to creating an organization that would qualify to hold an LPFM license. Native Americans have successfully organised educational, political and religious institutions. Native Americans run businesses and take care of their own homes and families. They serve in Government and the Military. They can make LPFM work, by themselves.

Preferential treatment by the FCC based on Race and Sex has allready been thrown out by the courts.

As to the issue of mutable stations being needed to serve "Native Lands", different groups of native people within a tribe can organize and apply for an LPFM. There is no need for one government entity (including tribal government) to control everything. Native people are capable to organize themselves! This includes small groups to operate LPFM's. The race based point system being proposed sounds so much like " The Great Father in Washington is going to take care of the little red people". It's wrong on all fronts.

In the proposal for a race based point system section 307 (B) of the communication act is sited as an excuse. Not for one minute do I believe that what Congress ever had in mind was government choosing some people as more worthy because of their Race, Sex, Religion, or politics.

Sincerely submitted.

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